



VIA E-MAIL

July 31, 2007

Polly Lowry
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, California 95670

Re: **Support** – *Special Order Requiring Specific Facilities to Comply with Waste Discharge Requirements General Order R5-2007-0035*

Dear Ms. Lowry:

On behalf of the Community Alliance for Responsible Environmental Stewardship (CARES) and its member organizations, allow me to express our qualified support for passage of the above-referenced special order. CARES coalition members represent virtually 100 percent of the California dairy industry, and include the three main dairy producer membership organizations (***Western United Dairymen, California Dairy Campaign*** and ***Milk Producers Council***) as well as the state's major producer-owned milk processing cooperatives and private companies manufacturing and marketing dairy products, and additional associations such as the ***Alliance of Western Milk Producers*** and the ***Dairy Institute of California***.

The Special Order provides important clarification as to how dairy operators under previously existing WDRs are to be regulated and should remove unnecessary confusion. It is appropriate to regulate these facilities under the same scheme as other existing milk cow dairies.

As with all other dairies, proper implementation of General Order R5-2007-0035 is essential within this subgroup of dairies. While we have concerns with some of the specific provisions of the General Order, we did not seek review of the Order by the State Water Resources Control Board. The Order imposes significant new and more stringent requirements, but phases in these requirements and provides for annual updates and opportunities for revision to address issues not presently foreseen. We have previously provided extensive comments and suggestions toward ensuring practical, efficient and cost-effective implementation and incorporate our comments on R5-2007-0035 by reference.

Community Alliance for Responsible Environmental Stewardship
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As always, our member organizations stand ready to assist the Regional Board wherever possible to assure smooth implementation of the regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.P. Cativiela', written over a light gray rectangular background.

J.P. Cativiela
CARES Program Coordinator